



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

**77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590**

JUL 13 2011

REPLY TO THE ATTENTION OF:

Mary Ann Dolehanty
Supervisor
Permits Section
Air Quality Division
Michigan Department of Environmental Quality
PO Box 30260
Lansing, Michigan 48909-7760

Dear Ms. Dolehanty:

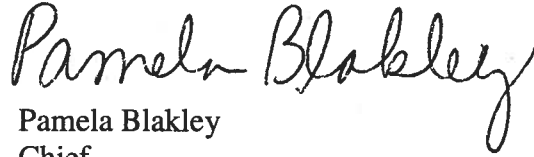
The U.S. Environmental Protection Agency reviewed the proposed preconstruction minor New Source Review (NSR) permit for Marathon Petroleum, located in Detroit, Michigan. Our comments are as follows:

- 1) The unit being permitted, a truck loading rack, was installed in 1978. Some questions that arise are: 1) whether there was a requirement for the facility to obtain a construction permit prior to the unit's construction, and/or 2) whether the unit was exempt from any construction permit requirements? It appears that the facility believes that the unit may be exempt from any construction permitting requirements. If the unit was installed without obtaining the proper pre-construction permits, and the unit's potential-to-emit are greater than the prevention of significant deterioration (PSD) thresholds, the current permit is an after-the-fact construction permit for modifications that have already taken place. The Michigan State Implementation Plan prohibits the construction of a modification to a stationary source prior to compliance with the requirements set forth. Commenting on the draft NSR permit should not be construed as an endorsement of issuing an after-the-fact construction permit, under this circumstance, to Marathon Petroleum, nor of the practice of issuing after-the-fact permits in general.
- 2) The permit establishes a Volatile Organic Compound limit of 17 tons per year for the truck loading rack. The permit seeks to limit the potential-to-emit. Therefore, the permit condition should cite to R336.1205 as the underlying authority for taking a federally enforceable emission rate restriction. Also, since the permit restricts the potential-to-emit of the emission unit to under the PSD significance threshold, the permit condition should contain a citation of the current permit number.

We provide these comments to help ensure that the project meets all federal requirements, that the permit provides all necessary information so that it is readily accessible to the public, and that the record provides adequate support for the permit decision.

We look forward to working with you to address all of our comments. If you have any further questions, please feel free to contact Danny Marcus, of my staff, at (312) 353-8781.

Sincerely,

A handwritten signature in black ink that reads "Pamela Blakley". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Pamela Blakley
Chief
Air Permits Section